

Exhibit A



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Transcript of Meet and Confer

Date: March 10, 2021

Case: Children Health Defense (CHD) -v- Facebook, Inc.

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17

1 about the oversight board related to Mr. Kennedy's
2 Instagram issue, which is not part of the complaint in
3 this case.

4 As I told you in my response to
5 correspondence, I am working with the client to look
6 into and investigate the specific questions that you
7 raised in that correspondence. And as soon as I get
8 the information from the client that I need, and
9 they're able to vet those questions, we'll get back to
10 you.

11 It is under way. I've been working actively
12 with the client to get to the bottom of that, and we'll
13 get you an answer. But I don't see how that would
14 relate to the trial question or any of the other
15 questions in this case.

16 MS. HOLLAND: Okay.

17 MR. TEICH: This is -- what's that, Mary?

18 MS. HOLLAND: I just said I think it may
19 relate to the trial. But that is very helpful, Sonal.
20 Thank you.

21 MR. TEICH: And, for the record, we wrote
22 Sonal on February 24th regarding Mr. Kennedy's
23 Instagram take down of February 10th.

24 We requested -- and Mr. Kennedy's offer to
25 not escalate this dispute farther by having that matter

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18

1 heard by Facebook's oversight board.

2 We asked, because of various deadlines, the
3 oversight board and other, that Sonal would give us a
4 substantive response within 48 hours, which was
5 February 26th.

6 And in the evening of February 26th, I
7 received a one-sentence email response from Sonal
8 saying she could not respond; she needed to consult
9 with the client. And we have had no further
10 communication now ten days or more longer since then.

11 So we have indicated in the case management
12 statement that, assuming Facebook is not willing to
13 have that matter heard by its oversight board,
14 Mr. Kennedy anticipates filing an original action and
15 moving to consolidate under Rule 42. So that would
16 affect -- or might affect the trial estimate.

17 MS. MEHTA: Okay. Well, I'm not going to go
18 through and respond to all of that, other than to say
19 the emails and the letters and everything are all in
20 the record. So I'm not going to do a timeline on the
21 phone. And I've already mentioned that we're looking
22 into it and we'll get back to you.

23 And with respect to the trial, I don't know
24 what your intention is, and so I'm not sure I have any
25 response to that until I see and understand what it is